

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**ROBERT CENTENO, EBENEZER ABAJE,
OLAOLU ADEDYOIN, ERIC AGANA,
TANJILA AHMED, CARLOS ALBO,
TOMAS AMIDAR, AKINTUNDE BAKARE,
JANICE BARNES, VANESSA BROWN,
SHARON BROWN-TURNER, MICHAEL
BRUNER, KIRSTEN BUGGAGE, JEFFREY
BYRD, LANEYSA CARLVIN, ELSA
CASTANARES, DREW DEVENNEY,
SIMONE GEBRESELASSIE, MIGUEL
GUERRERO, ISAAC HASTY, ROSIE
HIRZEL-VICUNA, BRIAN JOHNSON,
ALISHA JORDAN, PHYLLIS KARANJA,
ALEXIS KHAMPHAVONG, FARRUKH
KHAWAJA, NORMAN LOVE, RUTH
MBATIA, PAUL MCBEAN, LATRICE
MOORE, GARY MORGAN, REJOICE
MOYANAH, ALICE MUTUNE, OWAIS
NOORANI, ONYEKA NWOBU, MUYIWA
OGUNJOBI, OLUKAYODE OGUNJOBI,
OLUMIDE OGUNJOBI, VARUN PANT,
DEBORAH ROBERTS, NANCY SEGURA,
ABDUL SHAKOORI, STEVEN SHEARON,
ANJILA SHRESTHA, SURACHHYA
SHRESTHA, IQRA SIKANDAR,
STEPHANIE SURRATT, TYLER
WASHINGTON, JASON WELLS, KIONNA
WHITE, DeEDTRA WILLIAMS. KRISTIAN
WILLIAMS, SYED YAQUEEN AND LESHA
ZIMMERMAN,**

Plaintiffs,

-vs-

**RETREAT CAPITAL MANAGEMENT,
INC., D/B/A ALLSEC FINANCIAL
SERVICES, a California Corporation,
ALLSECTECH, INC., a Delaware
Corporation, ALLSEC TECHNOLOGIES
LTD, an Indian Company, and ADISESHAN**

Case No: 3:18-CV-02539-S

JURY TRIAL DEMANDED

SARAVANAN, Individually,

Defendants. /

**PLAINTIFF'S STIPULATION OF VOLUNTARY DISMISSAL OF TANJILA AHMED'S
CLAIM *WITHOUT* PREJUDICE**

Plaintiff, TANJILA AHMED, by and through her undersigned counsel, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby files her Notice of Voluntary Dismissal of her claim *without* prejudice and withdraws from this lawsuit. All other Plaintiffs' claims remain active and pending before the Court.

Respectfully submitted this 16th day of November, 2018.

/s/ ANDREW R. FRISCH

Andrew R. Frisch
Morgan & Morgan, P.A.
600 N. Pine Island Road, Suite 400
Plantation, FL 33324
T: (954) WORKERS; F: (954) 327-3013
E-mail: AFrisch@forthepeople.com

-and-

C. Ryan Morgan, Esq.
Pro Hac Vice forthcoming
Morgan & Morgan, P.A.
20 N. Orange Ave., 14th Floor
P.O. Box 4979
Orlando, FL 32802-4979
T: (407) 420-1414; F: (407) 245-3401
Email: RMorgan@forthepeople.com

Attorneys for Plaintiff

-and-

/s/ Stewart Hoffer

Stewart Hoffer
SDTX No. 20123
Texas Bar No. 00790891

shoffer@hicks-thomas.com

Kasi Chadwick

SDTX No. 2421911

Texas Bar No. 24087278

kchadwick@hicks-thomas.com

A. Elizabeth Larson

Texas Bar No. 24076950

llarson@hicks-thomas.com

HICKS THOMAS LLP

700 Louisiana, Suite 2000

Houston, Texas 77002

Telephone: (713) 547-9100

Facsimile: (713) 547-9150

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which I understand will send a notice of electronic filing to all parties of record.

/s/ ANDREW R. FRISCH

Andrew R. Frisch